

REMOVAL REPORT

FOR

LANE PLATING REMOVAL ACTION
5322 BONNIE VIEW ROAD
DALLAS, DALLAS COUNTY, TEXAS

Prepared for

U.S. Environmental Protection Agency Region 6
Will LaBombard, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

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EPA OSC Mark Hayes
START-3 PTL José L. Ojeda

Prepared by

Weston Solutions, Inc.
Cecilia H. Shappee, P.E., Program Manager
5599 San Felipe, Suite 700
Houston, Texas 77056
(713) 985-6600

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EXECUTIVE SUMMARY

On 10 March 2016, the Region 6 U.S. Environmental Protection Agency (EPA) Emergency Management Branch (EMB) under Contract No. EP-W-06-042 tasked Weston Solutions, Inc. (WESTON®), the EPA Region 6 Superfund Technical Assessment Response Team (START-3) contractor, to perform a Removal Assessment (RA) at the Lane Plating Works, Inc. site located at 5322 Bonnie View Road in Dallas, Dallas County, Texas (Technical Direction Document [TDD] No. 5/WESTON-042-16-004). The RA was initiated in response to a request by the Texas Commission on Environmental Quality (TCEQ) to EPA Region 6 and included soil and waste sampling. START-3 initial RA activities were completed between 05 and 13 April 2016. Based on the analytical results from waste samples collected by START-3 during the April 2016 sampling event, EPA-EMB requested that removal actions be conducted at the Lane Plating facility (Lane Plating Removal Action). Additional RA activities were also requested by EPA-EMB through TDD No. 5/WESTON-042-16-008. Lane Plating Removal Assessment Phase II activities were completed between 19 and 23 September 2016. RA Phase II activities included further delineation of on-site contaminants of concern and were completed by collecting additional soil samples for analytical testing. On 22 August 2016, Region 6 EPA-EMB tasked START-3 under TDD No. 5/WESTON-042-16-010 to provide technical support, contractor oversight, and documentation of removal activities. Emergency and Rapid Response Services (ERRS) contractors completed waste characterization activities in October 2016; associated waste transport and disposal activities were completed in November 2016. During the removal action, EPA characterized, transported, and disposed of on-site accumulated and containerized waste in the following waste streams listed below. The associated volume per waste stream is also provided.

- UN1755, Waste Chromic Acid Solutions – 121,500 lb
- UN3077, Waste Solid N.O.S. (contaminated soil) – 17,750 lb
- UN3082, Waste Liquid N.O.S. (Cadmium/Chromium) – 5,810 lb
- UN3262, Waste Corrosive Solid, Basic (Sodium Hydroxide /Cadmium) – 1,450lb
- UN3260, Waste Corrosive Solid, Acidic, N.O.S. (Sulfuric Acid/Cadmium, Chromic Acid) – 3,300 lb
- UN3264, Waste Corrosive Liquid, Acidic (Hydrochloric Acid, Sulfuric Acid) – 2,000 lb
- UN1755, Waste Chromic Acid Solution – 18,200 lb

- UN1830, Waste Sulfuric Acid – 1,765 lb
- UN3506, Waste Mercury – 9 lb
- UN1001, Acetylene, Dissolved – 150 lb
- UN1993, Waste Flammable Liquids, N.O.S. (Methyl Ethyl Ketone) – 3,867 lb
- UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide) – 11,816 lb
- Non-RCRA hazardous Waste Solid (Oil Filters) – 61 lb
- Non-Hazardous Liquid (Latex Paint) – 190 lb

On 18 November 2016, the EPA Team completed field activities and demobilized from the site.

This Removal Action Report was prepared to describe the technical scope of work that was completed as part of the TDD No. 5/WESTON-042-16-010. The EPA On-scene Coordinator (OSC) was Mark Hayes. The EPA Team Project Team Leader (PTL) was José L. Ojeda.

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The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.

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1 INTRODUCTION

On 10 March 2016, the U.S. Environmental Protection Agency (EPA) Region 6 Emergency Management Branch (EMB) under Contract No. EP-W-06-042 tasked Weston Solutions, Inc. (WESTON®), the EPA Region 6 Superfund Technical Assessment Response Team (START-3) contractor, to perform a Removal Assessment (RA) at the Lane Plating Works, Inc. (Lane Plating) site located at 5322 Bonnie View Road in Dallas, Dallas County, Texas (Technical Direction Document [TDD] No. 5/WESTON-042-16-004). The RA was initiated in response to a request by the Texas Commission on Environmental Quality (TCEQ) to EPA Region 6 and included soil and waste sampling. Initial RA activities were completed between 05 and 13 April 2016. Based on the analytical results from waste samples collected by START-3 during the April 2016 sampling event, EPA-EMB requested that removal actions be conducted at the Lane Plating facility. Additional RA activities were also requested by EPA-EMB through TDD No. 5/WESTON-042-16-008. Lane Plating Removal Assessment Phase II activities were completed between 19 and 23 September 2016. RA Phase II activities included further delineation of on-site contaminants of concern and were completed by collecting additional soil samples for analytical testing.

On 22 August 2016, Weston Solutions, Inc. (WESTON®), the EPA Region 6 START-3 contractor, was tasked by the Region 6 EPA-EMB under Contract Number EP-W-06-042 and TDD No. 5/WESTON-042-16-010 (Appendix E) to provide technical assistance, contractor oversight, and documentation of on-site activities during the removal action at the Lane Plating site. A Site Location Map is provided as Figure 1-1.

This removal action report describes the technical scope of work of removal activities at the Lane Plating facility conducted by Environmental Restoration, the Emergency and Rapid Response Services (ERRS) contractors. The EPA On-scene Coordinator (OSC) was Mark Hayes. The EPA Team Project Team Leader (PTL) was José L. Ojeda. The EPA Identification (ID) number for the site is TXN000605240.

1.1 PROJECT OBJECTIVES

The objective of this removal action was to eliminate the imminent threat and substantial

endangerment to public health and welfare and the environment posed by on-site hazardous substances, pollutants, and contaminants at the Lane Plating facility. EPA accomplished the project objective through removal and off-site disposal of on-site accumulated, containerized waste.

The objectives were achieved by monitoring removal activities, coordinating with EPA OSC Hayes, and providing written and photographic documentation of site removal activities.

1.2 SCOPE OF WORK

The Removal Action scope of work included the following activities:

- Containerized on-site waste materials were segregated into compatible waste streams; bulked, as applicable; transferred or over-packed into appropriate shipping containers; and transported off-site for treatment and/or disposal.
- Conducted indoor air monitoring during removal activities.
- Provided oversight and documentation of removal activities.
- Coordinated with EPA OSC and ERRS contractors.

1.3 REPORT FORMAT

This report has been organized as follows:

Section 1 - Introduction

Section 2 - Site Background

Section 3 - Actions Taken

Section 4 – Summary

Additional information is provided in the appendices following the text of this report. The appendices are as follows:

Appendix A Site Logbook

Appendix B Digital Photographs

Appendix C Waste Manifests

Appendix D Pollution Reports

Appendix E TDD No. 5/WESTON-042-16-010

2 SITE BACKGROUND

Information regarding site location, site description, potential sources of hazardous material, operational and regulatory history, and summary of previous investigations is presented in the following subsections.

2.1 SITE LOCATION AND DESCRIPTION

The site is located at 5322 Bonnie View Road in Dallas, Dallas County, Texas, within a mixed commercial and residential area. The approximate center of the site is located at Latitude 32.6878557° North and Longitude 96.7692897° West. The site consists of a 15,452-square foot electroplating process building, a waste storage shed, a former wastewater treatment building, and miscellaneous tractor trailers. The site encompasses approximately 4.655 acres according to the Dallas County Central Appraisal District. A relative of the owner resides in a home located adjacent to the north side of the site; a residential area is located 0.25-mile northwest; to the east approximately 7 miles is H. Grady Spruce High School; and 0.3 mile to the south is Five Mile Creek that discharges into the Trinity River. A barbed-wire fence and locked chain-link fence surrounds the property, and the building is locked with the windows boarded up. There is no access to the site except by key at the locked gate. Site topography and surface water drainage appears to slope to the south-southeast. A Site Area Map is provided as Figure 2-1. A Site Property Map is provided as Figure 2-2.

Lane Plating Works, Inc. is an abandoned electroplating facility and contains electroplating wastes from operations that ended in 2015. The property is currently controlled by Stag Management, Inc., a court-appointed trustee. Typical electroplating process waste identified on-site includes acids, bases, flammables, oxidizers, cyanides, chromium-contaminated solids (sludge) and liquids, and Resource Conservation Recover Act (RCRA) non-hazardous solids and liquids.

2.2 POTENTIAL SOURCES OF HAZAROUS MATERIALS

Information concerning the known or potential hazardous substance source areas at the site are presented in the following section.

Based on the Texas Commission on Environmental Quality (TCEQ) investigation conducted on

04 November 2015 and on TCEQ sampling activities on 19 November 2015, former site activities that contributed to potential sources include the following:

- Stripping metal parts of dirt, oil, grease, and scale in acid.
- Grinding and buffing metal parts smooth prior to and during plating.
- Pretreatment of metal parts using sodium hydroxide and sulfuric acid.
- Copper plating using copper cyanide.
- Zinc plating aluminum using nitric acid and zinc cyanide.
- Nickel plating using nickel sulfate.
- Chrome plating using chromic acid.
- Electroplating wastewater treatment.
- Generation and storage of solid waste.

2.3 OPERATIONAL AND REGULATORY HISTORY

Lane Plating was in operation for over 50 years at the site as an electroplating facility, conducting primarily (60% to 70%) hard chromium plating and cadmium plating. Processes performed at the facility included chromate dips, chromic acid anodizing, hard chrome plating, cadmium plating, black oxide coating, electroless nickel plating, passivation, machining, and grinding. In addition to electroplating, the facility also operated a lead melting pot used to repair anodes used in the plating baths. The facility housed two chrome tanks, and according to TCEQ Air Compliance Section reports, the emission from the tanks was controlled by a mesh-pad scrubber and mist eliminator fume hood system. The last updated Notice of Registration (NOR), dated 18 January 2011, listed 10 hazardous wastes and 3 Class II Industrial Solid Wastes.

2.4 SUMMARY OF PREVIOUS INVESTIGATIONS

Information regarding previous on-site investigations conducted by state and federal regulatory agencies are summarized in this section.

In February 2010, the TCEQ Dallas/Fort Worth (Region 4) office conducted an unannounced investigation at the facility. Sixteen 55-gallon drums of hazardous plating waste were observed unlabeled and missing necessary identification and accumulation dates. A Notice of Violation (NOV) letter was transmitted to the facility on 24 February 2010 for alleged violations of *30 Texas*

Administrative Code (TAC) 35.69 for failure to properly label hazardous waste containers.

On 19 January 2011, the TCEQ conducted an Industrial and Hazardous Waste (IHW) Compliance Evaluation Investigation (CEI) at the facility. Based on observations made during the CEI, it was determined that soil sampling was necessary. As a result of the CEI, five alleged violations and one additional issue regarding the rules for IHW were documented and formal enforcement action was initiated.

A proposed Agreed Order was issued to the facility on 5 July 2011. This Agreed Order directed the facility to complete technical requirements, including immediately:

- Ceasing any additional unauthorized discharges
- Removing all discharged industrial solid waste, visibly impacted soils, and waste containers from the facility.
- Disposing of waste properly at an authorized facility.
- Developing and implementing procedures to ensure that all containers storing hazardous waste were removed within the allotted accumulation time limit and transported to a facility authorized to accept the waste.
- Submitting annual waste summaries for calendar years 2008 and 2009.
- Begin maintaining all records of all hazardous and industrial solid waste activities.
- Submitting an Affected Property Assessment Report (APAR).

On 16 September 2014, the TCEQ Enforcement Division requested the TCEQ Region 4 office to conduct an on-site investigation at Lane Plating to determine if the facility had complied with the Agreed Order.

On 23 March 2016, EPA, TCEQ, and START-3 conducted a preliminary reconnaissance to observe current site conditions and to discuss project objectives for the initial RA (TDD No. 5/WESTON-042-16-004). START-3 conducted air monitoring within the building for acid gas, volatile organic compounds (VOCs), and mercury vapors during the site visit. During the preliminary reconnaissance, soil and liquid waste sampling strategies were discussed between EPA and START-3.

Following the preliminary reconnaissance, EPA and START-3 developed a sampling strategy that included establishing a 50-foot by 50-foot sampling grid surrounding the footprint of the facility.

On 05 April 2016, START-3 mobilized to the site and established 50-foot by 50-foot grids around the exterior facility utilizing a Trimble Pro-XRT Global Positioning System (GPS) unit. The corner points of each grid were marked with pin flags and labeled.

START-3 conducted soil and liquid waste sampling activities from 12 through 13 April 2016. All sampling activities were completed in accordance with the START-3 Quality Assurance Sampling Plan. During field assessment activities, a total of 36 soil samples (30 composite samples and six grab samples) including duplicate samples were collected and analyzed to determine nature and extent of hazardous substances in soil. A review of the soil analytical results indicated that two prevalent hazardous substances, hexavalent chromium and lead, were detected at levels exceeding EPA Regional Screening Levels (RSLs) criteria (Industrial Soil [THQ = 1.0], May 2016). Four liquid waste samples (including three normal samples and one duplicate sample) were collected from totes located within the facility to confirm the presence of hazardous substances. The four liquid waste samples were identified as hazardous waste based on the characteristic of corrosivity and elevated total chromium results.

On 19 September 2016, the EPA Team returned to the site to conduct additional soil sampling (TDD No. 5/WESTON-042-16-008) to further characterize the property and to further determine the nature and extent of site-related hazardous constituents associated with electroplating waste (plating waste) in on-site soils.

From 20 through 23 September 2016, the EPA Team collected composite five-point soil samples from within approximately 76 grids, an additional 33 grids from the previous sampling event conducted in April 2016. Samples were collected at three depth intervals: 0 to 6 inches below ground surface (bgs), 6 to 12 inches bgs, and 12 to 18 inches bgs. Soil samples were submitted for analysis of metals and hexavalent chromium (Cr [VI]). A total 216 samples (192 normal and 20 duplicate) were collected during this sampling event. Samples collected at the 6 to 12 inch bgs interval were placed on hold pending analytical results from the 0 to 6 inch bgs and 12 to 18 inch bgs intervals.

3 ACTIONS TAKEN

During this Lane Plating Removal Action, EPA removed accumulated on-site waste identified during the removal assessment and transported it off-site for disposal. Containerized waste materials found within plating vats, drums, pails, and tote tanks were field tested for hazardous waste characteristics and compatibility, as needed; segregated into compatible waste streams; bulked, as applicable; transferred or over-packed into U.S. Department of Transportation (DOT) shippable containers; and transported off-site for treatment and/or disposal. Site soils identified during the Removal Assessment (TDD No. 5/WESTON-042-16-008) as containing elevated concentrations of hexavalent chromium and lead and/or mercury were not addressed during this removal action. Site soil previously excavated by the property owner at the direction of TCEQ was transported and disposed off-site as part of this removal action.

On 3 October 2016, the EPA Team mobilized to the site to begin waste characterization of liquid waste found in various totes, drums, and buckets within the facility, and to consolidate remaining liquid waste into appropriate containers. From 4 October through 18 October 2016, the EPA Team conducted the hazardous characterization identification of approximately 153 containers. Drums and containers were grouped by waste streams and compatibility for future transport and disposal at an authorized facility. In addition to consolidating waste streams, vats and sumps were pumped of their contents and transferred into compatible containers. Field tested waste stream inventory included the following:

- Cyanide (CN) Solution
 - 23 55-gallon drums
 - 1 275-gallon tote
- Cyanide (CN) Solids
 - 2 55-gallon drums
- Acid/Oxidizer (chromic acid)
 - 21 55-gallon drums
 - 39 275-gallon totes
 - 1 330-gallon tote
- Acid/Oxidizer sludge (chromic acid sludge and solids)
 - 22 55-gallon drum

- 1 95-gallon overpack
 - 1 cubic-yard box (bricks from vat bottom)
- Sulfuric Acid
 - 2 55-gallon drums
 - 9 30-gallon drums
- Flammable Paint
 - 2 55-gallon drum loose pack
- Latex paint
 - 2 55-gallon drum loose pack
- Flammable Aerosol
 - 2 5-gallon pails
- Acid Solids
 - 2 55 gallon drums
- Acid Liquids
 - 4 55-gallon drums
- Neutral Liquids
 - 1 275-gallon tote
 - 9 55-gallon drums
- Neutral Solids
 - 2 cubic yard boxes
- Elemental Mercury
 - 1 5-gallon pail
- Waste Oil
 - 2 55-gallon steel drums
 - 1 330-gallon tote
- Waste Oil Filters
 - 1 55-gallon steel drum
- Flammable Liquids
 - 1 55-gallon steel drum
- Caustic Solids
 - 4 55-gallon drums
 - 1 cubic yard box

- Caustic Liquids
 - 12 55-gallon drums
 - 1 30-gallon drum (ammonia hydroxide)
- Soil
 - 12 cubic-yard bulk bags
 - 2 55-gallon drums

From 14 through 18 November 2016, the EPA Team returned to the site to coordinate and arrange for the transportation of on-site waste containers to an authorized facility for final disposal. Table 3-1 provides a summary of waste disposal. Each waste manifest is listed and the associated waste stream, disposal volume and designated disposal facility are documented.

Table 3-1
Summary of Waste Disposal

Date	Designated Facility	Manifest Tracking Number	Waste Description	Containers		Approximate Total Quantity (lb)
				No.	Type	
11/16/2016	Clean Harbors Deer Trail Landfill, Deer Trail, CO	9776314	UN1755, Waste Chromic Acid Solution	15	TP	43,000
11/17/2016	Clean Harbors Deer Trail Landfill, Deer Trail, CO	9776315	UN1755, Waste Chromic Acid Solution	14	TP	43,000
			UN1755, Waste Chromic Acid Solution	3	DF	1,500
		9776316	UN1755, Waste Chromic Acid Solution	11	TP	34,000
			UN3077, Waste Solid N.O.S. (contaminated soil)	5	BA	5,800
		9776313	UN3077, Waste Solid N.O.S. (contaminated soil)	7	BA	7,000
			UN3082, Waste Liquid N.O.S. (Cadmium/Chromium)	1	TP	3,000
			UN3077, Waste Solid N.O.S. (Chromium)	9	CF	1,350
			UN3077, Waste Solid N.O.S. (Contaminated Soil)	2	DF	600
			UN3262, Waste Corrosive Solid, Basic (Sodium Hydroxide)	1	CF	900
		9776307	UN3260, Waste Corrosive Solid, Acidic, N.O.S. (Sulfuric Acid/Cadmium)	2	DF	300
			UN3262, Waste Corrosive Solid, Basic, N.O.S. (Sodium Hydroxide/Cadmium)	4	DF	550
			UN3264, Waste Corrosive Liquid, Acidic (Hydrochloric Acid, Sulfuric Acid)	4	DF	2,000
			UN3082, Waste Liquid, N.O.S. (Cadmium/Chromium)	9	DF	2,400
			UN3082, Waste Liquid, N.O.S. (Cadmium/Chromium)	1	DF	410
			UN1755, Waste Chromic Acid Solution	18	DF	9,000
			UN1755, Waste Chromic Acid Solution	22	DF	8,800

Date	Designated Facility	Manifest Tracking Number	Waste Description	Containers		Approximate Total Quantity (lb)
				No.	Type	
11/17/2016	Clean Harbors Deer Trail Landfill, Deer Trail, CO	9776307	UN1755, Waste Chromic Acid Solution	1	DF	400
			UN1830, Waste Sulfuric Acid	9	DF	1,350
			UN1830, Waste Sulfuric Acid	2	DF	415
			Non-RCRA hazardous Waste Solid (Oil Filters)	1	DF	61
			UN3260 Waste Corrosive Solid, Acidic (Chromic Acid)	2	CF	3,000
	Veolia ES Technical Solution, Henderson, CO	9776310	UN3506, Waste Mercury	1	DF	9
11/18/2016	Clean Harbors La Porte, La Porte, TX	9776312	UN1001, Acetylene, Dissolved	1	CY	150
	Clean Harbors Environmental Services, Kimball, NE	9776308	UN1993, Waste Flammable Liquids, N.O.S. (Methyl Ethyl Ketone)	1	DM	67
			UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide)	12	DF	4,800
			UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide)	1	DF	116
			UN2922, Waste Corrosive Liquids, N.O.S. (Sodium Hydroxide/Sodium Cyanide)	23	DF	6,900
	Clean Harbors Spring Grove Resource Recovery, Cincinnati, OH	9776309	UN1993, Waste flammable Liquids, N.O.S. (Methyl Ethyl Ketone)	2	DM	850
			UN1993, Waste flammable Liquids, N.O.S. (Methyl Ethyl Ketone)	1	DM	2,950
	Clean Harbor Deer Trail Landfill, Deer Trail, CO	9776110	UN3077, Waste Solid, N.O.S. (Silver)	2	CF	3,000
	Twin Enviro Services Phantom Landfill, Penrose, CO	Non-Hazardous Waste Manifest	Non-Hazardous Liquid (Latex Paint)	2	DF	190
	Approximate Total Quantity (lb):					187,868

– BA Burlap, cloth, paper, or plastic bag
 – TP Portable Tanks
 – CF Fiber or plastic boxes, cartons, cases
 – CY Cylinders

– DF Fiberboard or plastic drums, barrels, kegs
 – DM Metal drums, barrels, kegs
 – lb pound

3.1 AIR MONITORING RESULTS

The EPA Team utilized a THERMO Data Ram DR-4000 to conduct air monitoring for particulate matter during removal activities. Air monitoring equipment was utilized in active work areas and was programmed to log particulate concentrations throughout the day. Readings were analyzed to determine average concentrations, peaks, and exceedances of particulates in the air at each sampling location. No readings above action levels were detected.

4 SUMMARY

From 4 October to 18 November 2016, EPA conducted and successfully completed a time-critical removal action at the Lane Plating Site. Removal Actions consisted of the removal and off-site disposal of accumulated, containerized on-site waste materials that comprised of hazardous substances, pollutants, or contaminants. From 4 October through 18 October 2016, the EPA team conducted the hazardous characterization identification of approximately 189 containers. Drums and containers were grouped by waste streams and compatibility for future transport and disposal at an authorized facility. From 14 through 18 November 2016, the EPA Team returned to the site to coordinate and arrange for the transportation of on-site waste containers to an authorized facility for final disposal. During the removal action, EPA characterized, transported, and disposed of on-site waste in the following waste streams and associated volumes.

- UN1755, Waste Chromic Acid Solutions – 121,500 lb
- UN3077, Waste Solid N.O.S. (contaminated soil) – 17,750 lb
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On 18 November 2016, the EPA Team completed field activities and demobilized from the site.